## Case 22-19628-ABA Doc 554-2 Filed 09/25/24 Entered 09/25/24 14:01:51 Desc Exhibit Page 1 of 7

Sklar Law LLC 20 Brace Road Suite 205 Cherry Hill, NJ 08034 8562584050 www.sklarlaw.com

September 23, 2024

Orbit Energy

Invoice Number: 9525

Invoice Period: 03-03-2024 - 09-23-2024

RE: Orbit Energy & Power, LLC 22-19628

## **Time Details**

Date	Professional	Description	Hours	Rate	Amount
03-26-2024	Andrew Sklar	review order approving Oldcastle settlement; email to Oldcastle counsel with order and payment instructions.	0.20	400.00	80.00
03-31-2024	Andrew Sklar	email to mediator and Google counsel regarding compliance with Local Rules	0.20	400.00	80.00
03-31-2024	Andrew Sklar	email to Google counsel regarding potential settlement	0.20	400.00	80.00
04-08-2024	Andrew Sklar	prepare, file and serve motion to replace mediator, extend time to conduct mediation, extend discovery and new trial date	2.10	400.00	840.00
04-24-2024	Andrew Sklar	review email from counsel for C&C Supply; prepare and send reply email	0.20	400.00	80.00
04-25-2024	Andrew Sklar	draft and file complaint against Newspaper Media Group	1.10	400.00	440.00
04-25-2024	Andrew Sklar	prepare and file adversary complaint against Turtle & Hughes	1.30	400.00	520.00
04-25-2024	Andrew Sklar	review corresp from counsel for Solar Foundations; prepare reply corresp and email same to counsel	0.40	400.00	160.00
04-27-2024	Andrew Sklar	review summons; prepare cover letter for service; mail summons and complaints to NMG and Turtle & Hughes	0.50	400.00	200.00
04-27-2024	Andrew Sklar	emails with counsel for Solar Foundations regarding settlement	0.30	400.00	120.00
04-29-2024	Andrew Sklar	emails with Solar Foundations USA counsel resolving preference claim	0.30	400.00	120.00
04-30-2024	Andrew Sklar	draft settlement agreement for Solar Foundations USA and email to counsel	1.00	400.00	400.00
04-30-2024	Andrew Sklar	review email from C&C counsel with new value supporting documents; draft reply email.	0.30	400.00	120.00
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05-02-2024	Andrew Sklar	emails with C&C counsel to resolve preference claim	0.20	400.00	80.00
05-06-2024	Andrew Sklar	email to Google counsel regarding mediator motion and potential settlement	0.20	400.00	80.00
05-07-2024	Andrew Sklar	appear (via Court Solutions) at motion to appoint new mediator and extend dates re: Sklar v. Google	0.50	400.00	200.00
05-08-2024	Andrew Sklar	emails to Google counsel; draft proposed order	0.40	400.00	160.00
05-08-2024	Andrew Sklar	draft email to Solar Foundations counsel to follow up on settlement agreement.	0.20	400.00	80.00
05-08-2024	Andrew Sklar	draft email to ABA with proposed order attached.	0.20	400.00	80.00
05-08-2024	Andrew Sklar	review order from court; email to A. Sodono regarding appointment as mediator	0.30	400.00	120.00
05-08-2024	Andrew Sklar	prepare draft settlement agreement for C&C Supply and email to Warren Wolf	0.90	400.00	360.00
05-10-2024	Andrew Sklar	tel call from A. Roseman counsel for Newspaper Media Group regarding adv pro	0.30	400.00	120.00
05-13-2024	Andrew Sklar	emails with Vulpio and Sodono to schedule initial conference	0.20	400.00	80.00
05-13-2024	Andrew Sklar	review email from W. Wolf regarding C&C settlement agreement; prep revised agreement; prep email to W. Wolf	0.30	400.00	120.00
05-13-2024	Andrew Sklar	tele call with counsel for Turtle & Hughes; prep stip extending time and email to counsel; review signed settlement agreement from counsel for Solar Foundations and email countersigned agreement to counsel	1.00	400.00	400.00
05-14-2024	Andrew Sklar	prepare notice of motion; certification; memo of law; proposed order; cert of service re: settlement with Foundations USA; file and serve same	2.20	400.00	880.00
05-14-2024	Andrew Sklar	review accountant report and prep email to accountant re: Google analysis to prepare for mediation	0.30	400.00	120.00
05-14-2024	Andrew Sklar	review email and documentation from Pierce-Phelps counsel; prepare reply email to counsel	0.40	400.00	160.00
05-15-2024	Andrew Sklar	prep and file notice of settlement regarding Solar Foundations USA	0.30	400.00	120.00
05-16-2024	Andrew Sklar	emails with counsel; execute and file stip extending time.	0.20	400.00	80.00
05-19-2024	Andrew Sklar	emailed filed stipulation to Turtle & Hughes counsel	0.10	400.00	40.00
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Date	Professional	Description Exhibit Page 3 of 7	Hours	Rate	Amount
05-20-2024	Andrew Sklar	review mediator retainer agreement, prep corresp to Sodono and return same	0.20	400.00	80.00
05-20-2024	Andrew Sklar	initial mediation call for Google adv pro	0.20	400.00	80.00
05-23-2024	Andrew Sklar	review corresp from Peirce-Phelps counsel, research Barnhill case, prep reply email to counsel	0.50	400.00	200.00
05-23-2024	Andrew Sklar	review email and documentation attached from Google counsel; discuss same with R. Snyder	0.60	400.00	240.00
05-24-2024	Andrew Sklar	prep email to Google counsel regarding additional documentation and potential settlement.	0.20	400.00	80.00
05-24-2024	Andrew Sklar	review email from mediator regarding scheduling; prepare reply email	0.10	400.00	40.00
05-25-2024	Andrew Sklar	prepare and file adversary complaint against Delmarva Power for recovery of post-petition payments	1.30	400.00	520.00
05-25-2024	Andrew Sklar	prepare of settlement for C&C Supply; prepare notice of motion to approve settlement; certification; memo of law; proposed order for C&C Supply	1.50	400.00	600.00
05-28-2024	Andrew Sklar	prep summons and pre-trial documents and cover letter to Delmarva Power	0.30	400.00	120.00
05-30-2024	Andrew Sklar	emails with counsel for Krannich Solar, review proposed consent order regarding unsecured claim	0.50	400.00	200.00
06-02-2024	Andrew Sklar	review corresp from counsel for Peirce-Phelps. Prep reply email regarding settlement.	0.30	400.00	120.00
06-03-2024	Andrew Sklar	prepare draft settlement agreement with Peirce- Phelps, prep and send email to P-P counsel	0.70	400.00	280.00
06-04-2024	Andrew Sklar	review email from Newspaper Media counsel; draft stip extending time and reply email	0.30	400.00	120.00
06-17-2024	Andrew Sklar	review and execute stip extending time; email to defendant counsel	0.20	400.00	80.00
06-19-2024	Andrew Sklar	review correspondence and documentation from Turtle & Hughes counsel; emails/tel call with R. Snyder regarding same; prepare reply to T&H counsel.	1.10	400.00	440.00
06-21-2024	Andrew Sklar	review corresp from counsel for Turtle & Hughes; prepare reply email	0.20	400.00	80.00
06-21-2024	Andrew Sklar	emails with mediator and counsel for Google	0.30	400.00	120.00
06-21-2024	Andrew Sklar	review revisions to settlement agreement from Pierce- Phelps counsel; draft revised settlement agreement and email to counsel	0.40	400.00	160.00
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06-22-2024	Andrew Sklar	prepare draft settlement agreement for Google adv pro; draft email to Google counsel	1.00	400.00	400.00
06-22-2024	Andrew Sklar	prepare draft settlement agreement for Turtle & Hughes and email to counsel	0.50	400.00	200.00
06-24-2024	Andrew Sklar	review email from Turtle & Hughes counsel and proposed revisions to settlement agreement; prep reply email.	0.40	400.00	160.00
06-26-2024	Andrew Sklar	review email from Pierce-Phelps counsel with signed settlement agreement	0.20	400.00	80.00
06-28-2024	Andrew Sklar	email to Pierce-Phelps counsel with completed settlement agreement and copy of motion to approve settlement; prepare motion to approve Pierce-Phelps settlement	2.00	400.00	800.00
06-28-2024	Andrew Sklar	review email and proposed changes to settlement agreement from counsel for Google; prepare reply email.	0.30	400.00	120.00
06-28-2024	Andrew Sklar	review email from Turtle & Hughes counsel; execute settlement agreement and prepare reply email to counsel	0.20	400.00	80.00
06-29-2024	Andrew Sklar	prepare and file notices of settlement of controversy for Peirce-Phelps and Turtle & Hughes; prepare, file and serve motion to approve Turtle & Hughes settlement	2.40	400.00	960.00
07-01-2024	Andrew Sklar	tele call from attorney Tim Prol regarding employment lawsuit filed against debtor in District of NJ; review docket of lawsuit		400.00	No Charge
07-02-2024	Andrew Sklar	email to counsel for Newspaper Media Group regarding answer to adv pro	0.10	400.00	40.00
07-20-2024	Andrew Sklar	email to Google counsel regarding settlement agreement; prepare and file notice of settlement re: Google	0.40	400.00	160.00
07-25-2024	Andrew Sklar	email to NMG counsel regarding making an offer or filing an answer	0.10	400.00	40.00
07-25-2024	Andrew Sklar	tele call with counsel for NMG to discuss settlement of adv pro	0.20	400.00	80.00
07-27-2024	Andrew Sklar	review email from Google counsel and revised settlement agreement; prepare email to counsel with executed agreement	0.30	400.00	120.00
07-27-2024	Andrew Sklar	prepare file file Notice of Motion to Approve Settlement with Google; memorandum of law; certification; order; certification of service; email filed motion to Google counsel; mail motion to debtor	1.70	400.00	680.00
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		counsel			
07-27-2024	Andrew Sklar	review file and email order to Solar USA counsel	0.30	400.00	120.00
07-29-2024	Andrew Sklar	prepare request for default against Delmarva	0.40	400.00	160.00
07-31-2024	Andrew Sklar	review order approving settlement with Turtle & Hughes; prepare email to T&H counsel with order	0.20	400.00	80.00
07-31-2024	Andrew Sklar	review order approving Pierce-Phelps settlement; email to P-P counsel	0.20	400.00	80.00
08-08-2024	Andrew Sklar	emails with NMG counsel; draft settlement agreement	1.00	400.00	400.00
08-15-2024	Andrew Sklar	review email from NMG counsel and prep reply email; prepare revised settlement agreement	0.40	400.00	160.00
08-30-2024	Paralegal Billing	mail entry of default to DelMarva; prep and file certificate of service	0.30	100.00	30.00
09-09-2024	Andrew Sklar	prepare request for default judgment, certification; memo of law and proposed order re: Delmarva Power & Light	0.80	400.00	320.00
09-09-2024	Dolores Murphy	Draft Request to Enter Default Judgment and COS	0.40	150.00	60.00
09-09-2024	Andrew Sklar	prepare notice of motion, trustee certification, memo of law, proposed order and certificate of service of Newspaper Media Group settlement; email/mail motion to parties per Certificate of Service	1.40	400.00	560.00
09-23-2024	Dolores Murphy	Ltr to Delmarva forwarding Default Judgment	0.20	150.00	30.00
09-23-2024	Dolores Murphy	Ltr to Bankruptcy Court requesting exemplified copy of Default Judgment	0.20	150.00	30.00
09-23-2024	Dolores Murphy	Preparation and filing of COS for Default judgment against Delmarva	0.20	150.00	30.00
09-23-2024	Andrew Sklar	prep corresp to clerk of the court requesting exemplified judgment re: Delmarva Power	0.20	400.00	80.00
09-23-2024	Andrew Sklar	prepare second fee application	1.00	400.00	400.00
			Total		16,540.00
Time Sum	mary				
Professional		Task	Hours		Amount
Andrew Sklar		*Avoidance Action Litigation		9.40	15,760.00
		*Case Administration		0.00	0.00
		*Claims Administration and Objections		0.50	200.00
		*Fee/Employment Applications		1.00	400.00
Dolores Murp	ohy	Prep of Corresp	0.40		60.00
		Prep of Pleadin		0.60	90.00
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Professional	Task Exhibit	Page 6 d	of 7 Hours	Amount
Paralegal Billing	*Avoidance Action Lit	gation	0.30	30.00
			Total Fees	16,540.00

## **Expenses**

Expenses		
Expense \$Postage	Description  \$Postage - mail motion to replace mediator to parties	<b>Amount</b> 1.76
prostage	\$Postage - mail motion to replace mediator to parties	1.70
\$Copies	Photocopies - motion to replace mediator to counsel	4.40
\$Costs	court filing costs - adversary complaint filing fee (Newspaper Media Group)	350.00
\$Costs	court filing costs - adversary complaint against Turtle & Hughes	350.00
\$Postage	\$Postage - mail summons and complaints to NMG and Turtle & Hughes by crr	18.34
\$Copies	Photocopies - summons and complaints to NMG and Turtle & Hughes	6.40
\$Copies	Photocopies - copy of filed motion to serve on Debtor's counsel	5.40
\$Postage	\$Postage - serve motion to approve settlement on debtor's counsel	2.35
\$Copies	Photocopies -corresp to Sodono and retainer agreement	1.00
\$Postage	\$Postage - mail retainer agreement to Sodono	0.88
\$Costs	court filing costs - adv. pro against Delmarva Power	350.00
\$Copies	Photocopies - C&C Settlement Motion	5.60
\$Postage	\$Postage - mail C&C settlement motion to debtor's counsel	2.35
\$Postage	\$Postage - summons, complaint and pre-trial documents to Delmarva Power	9.17
\$Copies	Photocopies - summons, complaint and pre-trial documents to Delmarva	3.00
\$Copies	Photocopies - motion to approve settlement with Peirce-Phelps	5.60
\$Postage	\$Postage - mail motion to approve Peirce-Phelps settlement to debtor counsel	2.35
\$Copies	Photocopies - motion to approve settlement with Google	4.80
\$Postage	\$Postage - mail Google settlement motion to debtor counsel	2.31
\$Copies	Photocopies - motion to approve settlement with NMG to debtor counsel	4.80
\$Postage	\$Postage - motion to approve settlement to debtor counsel by regular mail	2.31
\$Copies	Photocopies -	5.60
\$Copies	Photocopies - Request Default Judgment	5.60
\$Postage	\$Postage - regular mail Request Default Judgment	1.01
\$Postage	\$Postage - certified mail -return receipt requested - Request Default Judgment	9.92
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\$Postage	\$Postage - lette	r to clerk of th	ne court		0.69
				Total Expenses	1,155.64
Expense Summary					
Expense					Amount
\$Copies					52.20
\$Costs					1,050.00
\$Postage					53.44
				Total Expenses	1,155.64
				Total for this Invoice	17,695.64
				Previous Invoice Balance	14,777.32
				Payment on 04-11-2024	(14,777.32)
				Current Account Balance	17,695.64
				Trust Balance	0.00
			Total A	Amount to Pay as of 09-23-2024	17,695.64